

Hearing Date and Time: November 3, 2016 at 10:00 a.m. (Eastern Time)
Objection Deadline: October 31, 2016 at 4:00 p.m. (Eastern Time)

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**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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In re : Chapter 11
: :
Gawker Media LLC, *et al.*,¹ : Case No. 16-11700 (SMB)
: :
Debtors. : (Jointly Administered)
: :
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**NOTICE OF DEBTORS' MOTION FOR ENTRY OF AN ORDER APPROVING
(I) THE ADEQUACY OF THE DISCLOSURE STATEMENT, (II) THE SOLICITATION
AND NOTICE PROCEDURES WITH RESPECT TO CONFIRMATION OF THE
DEBTORS' JOINT CHAPTER 11 PLAN OF LIQUIDATION (III) THE FORM
OF BALLOTS AND NOTICES IN CONNECTION THEREWITH, AND
(IV) THE SCHEDULING OF CERTAIN DATES WITH RESPECT THERETO**

PLEASE TAKE NOTICE that on the date hereof the Debtors filed (a) the Debtors'
*Joint Chapter 11 Plan of Liquidation for Gawker Media Group, Inc., Gawker Media LLC, and
Gawker Hungary Kft.*² (as it may be modified, amended, or supplemented the "Proposed Plan"),

¹ The last four digits of the taxpayer identification number of the debtors are: Gawker Media LLC (0492); Gawker Media Group, Inc. (3231); and Kinja Kft. (5056). Gawker Media LLC and Gawker Media Group, Inc.'s mailing addresses are c/o Opportune LLP, Attn: William D. Holden, Chief Restructuring Officer, 10 East 53rd Street, 33rd Floor, New York, NY 10022. Kinja Kft.'s mailing address is c/o Opportune LLP, Attn: William D. Holden, 10 East 53rd Street, 33rd Floor, New York, NY 10022.

² Pursuant to the Unimoda APA, the Debtor entity that is currently known as Kinja Kft. is required to change its name. The Debtors anticipate that, by the date of the Disclosure Statement Hearing, that Debtor will be re-named as Gawker Hungary Kft.

(b) the Debtors' *Disclosure Statement for the Debtors' Joint Chapter 11 Plan of Liquidation for Gawker Media Group, Inc., Gawker Media LLC, and Gawker Hungary Kft.* (as it may be modified, amended, or supplemented, the "Proposed Disclosure Statement"), and (c) the Debtors' *Motion for Entry of an Order Approving (I) the Adequacy of the Disclosure Statement, (II) the Solicitation and Notice Procedures with Respect to Confirmation of the Joint Chapter 11 Plan of Liquidation for Gawker Media Group, Inc., Gawker Media LLC, and Gawker Hungary Kft., (III) the Form of Ballots and Notices in Connection Therewith, and (IV) the Scheduling of Certain Dates with Respect Thereto* (the "Motion").

PLEASE TAKE FURTHER NOTICE that a hearing (the "Hearing") on the Motion to consider (i) the adequacy of the Proposed Disclosure Statement; (ii) the solicitation procedures with respect to confirmation of the Plan; (iii) the form of ballots and notices in connection therewith; and (iv) the scheduling of certain dates related thereto, will be held before the Honorable Stuart M. Bernstein of the United States Bankruptcy Court for the Southern District of New York (the "Court"), in Room 723, One Bowling Green, New York, New York 10004-1408, on **November 3, 2016, at 10:00 a.m. (New York Time)**.

PLEASE TAKE FURTHER NOTICE that responses or objection to the Motion and the relief requested therein, if any, shall be in writing, shall conform to the Federal Rules of Bankruptcy Procedure and the Local Bankruptcy Rules for the Southern District of New York, and the *Order Establishing Certain Notice, Case Management, and Administrative Procedures and Omnibus Hearing Dates* [Docket No. 93] (the "Case Management Order"), EXCEPT THAT objection are due three days prior to the Hearing (**4:00 p.m. New York Time on October 31, 2016**) shall set forth the basis for the response or objection and the specific grounds therefore, and shall be filed with the Court electronically in accordance with General Order M-399 by

registered users of the Court's case filing system (the User's Manual for the Electronic Case Filing System can be found at <http://www.nysb.uscourts.gov>, the official website for the Court), with a hard copy delivered directly to chambers pursuant to Local Bankruptcy Rule 9028-1 and served so as to be actually received no later than **October 31, 2016 at 4:00 p.m. (New York Time)** (the "Objection Deadline"), upon: (i) the Office of the United States Trustee for the Southern District of New York, 201 Varick Street, Room 1006, New York, New York 10014 (Attn: Greg Zipes and Susan Arbeit); (ii) Ropes & Gray LLP, 1211 Avenue of the Americas, New York, New York 10036 (Attn: Gregg Galardi and Ross Martin), attorneys for the Debtors; (iii) Simpson Thacher & Bartlett LLP, 425 Lexington Avenue, New York, New York 10017 (Attn: Sandeep Qusba), counsel to the Official Committee of Unsecured Creditors of Gawker Media LLC, et al.; (iv) Latham & Watkins LLP, at both 330 North Wabash Avenue, Suite 2800, Chicago, IL 606011 (Attn: David Heller) and 885 Third Avenue, New York, New York 10022 (Attn: Keith A. Simon), counsel to US VC Partners LP, as Second Lien Lender.

PLEASE TAKE FURTHER NOTICE that a copy of the Motion may be obtained free of charge by visiting the website of Prime Clerk LLC at <https://cases.primeclerk.com/gawker/>. You may also obtain copies of any pleadings by visiting the Court's website at <http://www.nysb.uscourts.gov> in accordance with the procedures and fees set forth therein.

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PLEASE TAKE FURTHER NOTICE that the Hearing may be continued or adjourned thereafter from time to time without further notice other than an announcement of the adjourned date or dates at the Hearing. The Debtors will file an agenda before the Hearing, which may modify or supplement the Motion to be heard at the Hearing.

Dated: September 30, 2016
New York, New York

/s/ Gregg M. Galardi
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